

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Mark Herman Olley
Debtor 1
Annette Louis Olley
Debtor 2

Chapter 13

Case No. 1:17-BK-00752-HWV

Matter: Motion to Incur Debt/Obtain Credit

DEBTOR(S)' MOTION TO INCUR DEBT

AND NOW, come the Debtor(s), Mark Herman Olley and Annette Louis Olley, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Incur Debt/Obtain Credit and aver as follows:

1. This case was commenced by the filing on February 27, 2017 of a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor 2 was recently relocated back to Central Pennsylvania through her employment, and Debtor(s) are seeking to purchase a personal residence.
3. Debtor(s) have obtained approval for financing from Mortgage One Solutions located in Vienna Virginia.
4. It is estimated that the monthly payments on the mortgage will be approximately \$1,700.00 per month, including escrow for real estate taxes and homeowner's insurance, for 360 months. The interest rate on the mortgage note will be less than 4.500%.
5. Debtor(s) are confident that the increased payments will not affect Debtor(s)' ability to continue his Chapter 13 payments.
6. Debtor(s) intend to make all payments on the mortgage note outside the Chapter 13 plan in this case.
7. For all the reasons set out above, Debtor(s) believes that the granting of this Motion will not materially or adversely affect the interests of any creditor, nor Debtor(s)' prospects for successful completion of the Chapter 13 Plan in this case and will instead permit Debtor(s) to purchase a personal residence which is necessary for the Debtor(s) to live in, and hence necessary for the successful completion of the Chapter 13 Plan in this case.

WHEREFORE, Debtor(s) moves this Honorable Court for leave to incur the new debt described above and prays for such other and further relief as the Court deems just and proper.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: February 22, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)



8609 Westwood Center Drive, Suite 200
Vienna, Virginia 22182
Tel: 703 992 0142 Fax: 717-298-3304
www.lending1s.com

Date: February 8 , 2021

Pre-Approval For: Anette Olley
Property: 687 Polecat Road

We have the pleasure to inform you that you are eligible for our program based on your credit score and financial data you have provided us.

Purchase Price: \$359,000
Residency: Primary

A full approval is contingent upon the following conditions:

- Satisfactory appraisal review in the amount of \$325,000
- Satisfactory review of the Sales Contract
- Satisfactory review of the Title
- No Change in the Employment Status
- No Adverse changes in the credit score from the last pull

Your eligibility is valid for 45 days from the date of this letter. Approval IS contingent upon the sale of any other real estate.

Please feel free to contact me should you have any questions.

Sincerely,

Brian M. Tulli
NMLS #1598940
3920 Market Street (Suite 19)
Camp Hill, PA 17011
Btulli@lending1s.com
(717) 991-9555



The pre-approval statement above is presented as an estimate of an appropriate price that is realistic to consider. This is not a loan commitment nor is it a guarantee of any qualification. This statement is based solely on estimated figures and information available at the time of preparation.

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NOTICE

Notice is hereby given that:

The Debtor(s) filed a Chapter 13 Bankruptcy Petition on **February 27, 2021**.

A hearing on the above-referenced matter has been scheduled for:

United States Bankruptcy Court Ronald Reagan Federal Building Bankruptcy Courtroom (3rd Floor) Third & Walnut Streets Harrisburg, PA 17101	Date: March 16, 2021 Time: 9:30 AM
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Any objection/response to the above-referenced matter must be filed and served on or before **March 8, 2021**.

If service was properly made and Respondent(s) fail to file any objection/response by the above-specified date, the Court **may** determine after review of the Motion that no hearing is required and grant the relief requested.

If a default order has not been signed and entered, the parties or their counsel are required to appear in Court at the hearing on the above date and time.

Date: February 22, 2021

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
DETHLEFS PYKOSH & MURPHY
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the Debtor(s) Motion to Incur Debt/Obtain Credit, said Motion IS HEREBY GRANTED, and the Debtor(s) is permitted to obtain financing from Mortgage One Solutions for the purpose of purchasing a personal residence for Debtor(s), up to the purchase price of \$365,000.00 at an interest rate of 4.500% or less.

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, February 22, 2021, I served a true and correct copy of the **Debtor(s)' Motion to Incur Debt/Obtain Credit, Notice of Opportunity to Object and Hearing, and proposed Order** in this proceeding via electronic means or USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.

Paralegal for Paul D. Murphy-Ahles, Esquire

Label Matrix for local noticing
0314-1
Case 1:17-bk-00752-HWV
Middle District of Pennsylvania
Harrisburg
Mon Feb 22 08:56:07 EST 2021

Holy Spirit Hospital
c/o Geisinger Health System
PO Box 983034
Boston, MA 02298-3034

National Recovery Agency
2491 Paxton Street
Harrisburg, PA 17111-1036

Nationstar Mortgage LLC
Attn: Bankruptcy Dept.
PO Box 619094
Dallas, Texas 75261-9094

Mark Herman Olley
1037 Freedom Court
Quakertown, PA 18951-2788

PSECU
1500 Elmerton Avenue
Harrisburg, PA 17110-9214

Penn Diesel Service Company
337 North Fairville Avenue
Harrisburg, PA 17112-9771

RMA of Philadelphia, PC
2025 Technology Parkway, Suite 211
Mechanicsburg, PA 17050-9402

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101-1722

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite 1
Hummelstown, PA 17036-6625

Lane Bryant Retail
450 Winks Lane
Bensalem, PA 19020-5932

Nationstar Mortgage LLC
Robertson, Anschutz & Schneid P.L.
6409 Congress Ave.
Boca Raton, FL 33487-2853

(p) NATIONSTAR MORTGAGE LLC
PO BOX 619094
DALLAS TX 75261-9094

Orthopedic Institute of PA
3399 Trindle Road
Camp Hill, PA 17011-2286

PSECU
PO BOX 67013
HARRISBURG, PA 17106-7013

Pennsylvania Department of Revenue
Bankruptcy Division
P.O. Box 280946
Harrisburg, PA 17128-0946

Rosemont Pharmacy
Rosemont Square
1149 Lancaster Avenue #9
Bryn Mawr, PA 19010-2722

James Warmbrodt
701 Market Street, Suite 5000
Philadelphia, PA 19106-1541

Department of Education / NELNET
121 South 13th Street
Lincoln, NE 68508-1904

Paul Donald Murphy-Ahles
Dethlefs Pykesh & Murphy
2132 Market Street
Camp Hill, PA 17011-4706

Nationstar Mortgage LLC
6409 Congress Ave, Suite 100
Boca Raton, FL 33487-2853

Annette Louis Olley
1037 Freedom Court
Quakertown, PA 18951-2788

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Penn Credit Corporation
2800 Commerce Drive
Harrisburg, PA 17110-9307

Quantum Imaging and Therapeutic
PO Box 62165
Baltimore, MD 21264-2165

U.S. Department of Education C/O Nelnet
121 South 13th Street, Suite 201
Lincoln, NE 68508-1911

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Nationstar Mortgage, LLC
350 Highland Drive
Lewisville, TX 75067

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER	(d)PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021	End of Label Matrix	
		Mailable recipients	25
		Bypassed recipients	2
		Total	27

